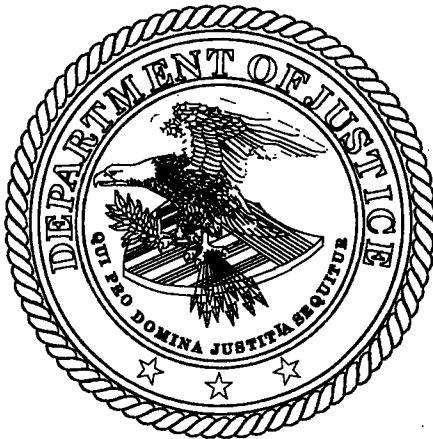


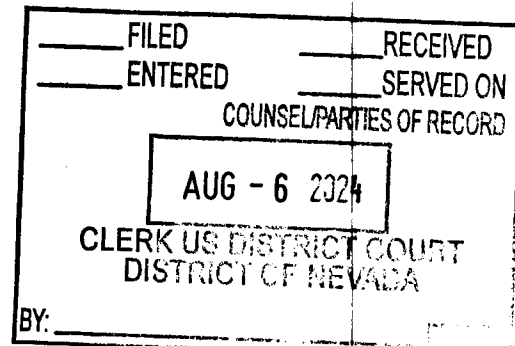
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SEALED

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8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 DARIUS TERRELL JONES,

14 and

15 JERION BALLOTT,

16 Defendants.

17 **SEALED**
 18 **CRIMINAL INDICTMENT**

19 Case No.: 2:24-cr- *0173-JAD-EJY*

20 **VIOLATIONS:**

21 Counts One through Seven:

22 18 U.S.C. §§ 922(a)(6) and 924(a)(2) – False
 23 Statement During Purchase of a Firearm

24 Count Eight through Eleven:

25 18 U.S.C. §§ 922(a)(6) and 924(a)(2) – False
 26 Statement During Purchase of a Firearm
 27 (Aiding and Abetting)

28 Count Twelve:

18 U.S.C. § 922(a)(1)(A), 923(a) and
 924(a)(1)(D) – Engaging in the Business of
 Dealing Firearms Without a License

29 **THE GRAND JURY CHARGES THAT:**

30 **COUNTS ONE THROUGH SEVEN**
 31 *False Statement During Purchase of a Firearm*

32 On or about the dates below, in the State and Federal District of Nevada,

DARIUS TERRELL JONES

defendant herein, in connection with, as described below, the acquisition of firearms from licensed dealers of firearms within the meaning of Chapter 44 of Title 18, United States Code (the "Dealers"), knowingly made and caused to be made a false and fictitious written statement to each of the Dealers, which statements were intended and likely to deceive each of the Dealers as to a fact material to the lawfulness of the sale of said firearms under Chapter 44 of Title 18, United States Code, in that DARIUS TERRELL JONES did complete and execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein DARIUS TERRELL JONES represented that he was the actual transferee/buyer of the firearms, when in fact, and as the defendant well knew, he was not the actual transferee/buyer of the firearms and was buying them for another person.

COUNT	DATE	DEALER (FEDERAL FIREARMS LICENSEE)	FIREARMS
ONE	05/18/2020	New Frontier Armory	1. Glock Model 26 9MM Pistol (S/N: BMXV676)
TWO	08/10/2020	New Frontier Armory	1. Ruger Model LC9, 9MM Pistol (S/N: 320-10828) 2. Remington Model R51, 9MM Pistol (S/N: 60004700R51) 3. Smith & Wesson Model M&P 380, .380 Caliber Pistol, (S/N: NFV7375)
		New Frontier Armory	1. Glock Model 17C, 9MM Pistol (S/N: KHL314)

THREE	09/02/2020		2. Glock Model 19, 9MM Pistol (S/N: BPLE584)
FOUR	09/16/2020	New Frontier Armory	1. HS Produkt Model XD40, .40 Caliber Pistol (S/N: GM149525) 2. France Model FNS-9C, 9MM Caliber Pistol, (S/N: CSU0033011) 3. Glock Model 19, 9MM Pistol (S/N: BNFX122) 4. Glock Model 48, 9MM Pistol (S/N: BPZG510) 5. Glock Model 43, 9MM Pistol (S/N: AEUS304) 6. Glock Model 45, 9MM Pistol (S/N: BHYY362) 7. Glock Model 43, 9MM Pistol (S/N: AEUS067)
FIVE	09/24/2020	Discount Firearms and Ammo	1. Smith & Wesson Model SD9VE, 9MM Pistol (S/N: FCR3333) 2. Smith & Wesson Model M&P 45 M20, .45 Caliber Pistol (S/N: NCP4404) 3. Walter Model CCP M2, 9MM Pistol (S/N: WK113439) 4. Glock Model 19X, 9MM Pistol (S/N: BRBT058) 5. Ruger Model Ruger 57, .57 Caliber Pistol (S/N: 641-51402)

			6. Smith & Wesson Model M&P 9 M2.0, 9MM Pistol (S/N: NHF4868)
SIX	01/26/2021	Discount Firearms and Ammo	1. Smith & Wesson Model M&P 9 Shield EX M2.0, 9MM Caliber Pistol (S/N: RJJ7115) 2. Israel Weapon Industry (IWI) Model Masada 9MM Pistol (S/N: M1017240) 3. Taurus Model G3, 9MM Caliber Pistol (S/N ABN 369800) 4. Taurus Model G3, 9MM Caliber Pistol (S/N: ABN366844)
SEVEN	03/05/2021	Discount Firearms and Ammo	1. Glock Model 19 Gen5, 9MM Pistol (S/N: BSCM330) 2. Glock Model 22 Gen5, .40 Caliber Pistol (S/N: BPAD564) 3. Taurus Model G3C, 9MM Pistol (S/N: ABL115283) 4. Smith & Wesson M&P 9 Shield, 9MM Pistol (S/N: JFV0758) 5. Israel Weapon Model Masada, 9MM Pistol (S/N: M1016679) 6. Glock Model 43, 9MM Pistol (S/N: AFDA094)

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNTS EIGHT THROUGH AND ELEVEN*False Statement During Purchase of a Firearm – Aiding and Abetting*

On or about the dates below, in the State and Federal District of Nevada,

**DARIUS TERRELL JONES, and
JERION BALLOTT**

defendants herein, in connection with, as described below, the acquisition of firearms from licensed dealers of firearms within the meaning of Chapter 44 of Title 18, United States Code (the “Dealers”), knowingly made and caused to be made a false and fictitious written statement to each of the Dealers, which statements were intended and likely to deceive each of the Dealers as to a fact material to the lawfulness of the sale of said firearms under Chapter 44 of Title 18, United States Code, in that DARIUS TERRELL JONES did complete and execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein DARIUS TERRELL JONES represented that he was the actual transferee/buyer of the firearms, when in fact, and as the defendant well knew, he was not the actual transferee/buyer of the firearms and was buying them for another person.

COUNT	DATE	DEALER (FEDERAL FIREARMS LICENSEE)	FIREARMS
EIGHT	04/14/2021	New Frontier Armory	<ol style="list-style-type: none"> 1. Diamondback Arms Inc. Model DB-15, 5.56 Caliber Pistol (S/N: DB2762370) 2. Glock Model 19X, 9 Caliber Pistol (S/N: BTDX659) 3. Ruger Model Ruger-57, 57MM Caliber Pistol (S/N: 642-15393)

			<p>4. Taurus International Model G2C, 9 MM Pistol (S/N: ACC680868)</p> <p>5. Taurus Model G2C 9MM Pistol (S/N: ACC680868)</p>
NINE	11/15/2021	New Frontier Armory	<p>1. Diamondback Arms Inc. Model DB-15, 5.56 Caliber Pistol (S/N: DB2762370)</p> <p>2. Glock Model 19X, 9 Caliber Pistol (S/N: BTDX659)</p> <p>3. Ruger Model Ruger-57, 57MM Caliber Pistol (S/N: 642-15393)</p> <p>4. Taurus International Model G2C, 9 MM Pistol (S/N: ACC680868)</p> <p>5. Taurus Model G2C 9MM Pistol (S/N: ACC680868)</p>
TEN	3/10/2022	New Frontier Armory	<p>1. Smith & Wesson Model M&P 40 Shield, .40 caliber pistol (S/N: HMP7461)</p> <p>2. Glock Model 43x, 9MM caliber Pistol, (S/N: BWKW063)</p> <p>3. Glock Model G26, 9MM Pistol (S/N: PDY217)</p> <p>4. Beretta Mode APX Carry, 9MM Pistol (S/N: AXC056285)</p>

ELEVEN	3/16/2022	New Frontier Armory	<ol style="list-style-type: none"> 1. Glock Model 26 Gen 5, 9MM Pistol (S/N: AGKD407) 2. Taurus Model Gx4, 9MM Pistol (S/N: 1GA69722) 3. Taurus Model G3C, 9MM Pistol (S/N: ACM689259) 4. Glock model 22, .40 Pistol (S/N: VVU734)
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All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWELVE

Engaging in the Business of Dealing Firearms Without a License

Beginning from a time unknown but no later than on or about May 18, 2020, and continuing to or about March 16, 2022, in the State and Federal District of Nevada,

DARIUS TERRELL JONES,

defendant herein, not being a licensed dealer, importer, and manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of dealing

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1 in, importing, and manufacturing firearms, all in violation of Title 18, United States Code,
2 Sections 922(a)(1)(A), 923(a) and 924(a)(1)(D).
3

4 **DATED: this 6th day of August, 2024.**

5 **A TRUE BILL:**
6

7
8 **/S/**
FOREPERSON OF THE GRAND JURY

9 **JASON M. FRIERSON**
10 **United States Attorney**

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14 **LAUREN M. IBANEZ**
Assistant United States Attorney
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